## Case 1:22-cr-00658-PKC Document 16 Filed 06/16/23 Page 1 of 1

## Law Offices of Ezra Spilke

Sentencing is adjourned from June 28, 2028 to October 5, 2023 at 11:00 a.m.

SO ORDERED.

Dated: 6/16/2023

1825 Foster Avenue, Suite IK Brooklyn, New York 11230 t: (718) 783-3682 e: ezra@spilkelaw.com www.spilkelaw.com

P. Kevin Castel United States District Judge

June 16, 2023

By ECF

The Honorable P. Kevin Castel United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312

Re: United States v. Maria Perez, true name Elisa Martinez, No. 22 Cr. 658 (S.D.N.Y.)

Your Honor:

With the government's consent, I write to request an adjournment of Ms. Martinez's sentencing hearing. We are still awaiting records relevant to sentencing, including medical records pertaining to Ms. Martinez's infant son. In addition, an adjournment will give the parties an adequate opportunity to discuss awarding Ms. Martinez credit under proposed § 4C1.1 of the Sentencing Guidelines. Chambers has informed me that October 5, 2023, at 11:00 AM, is a convenient time for the Court.

This is the first request for an adjournment. Please excuse the lateness of this letter. Yesterday, I concluded trial before Judge Caproni in *United States v. Jonathan Garcia*, 19 Cr. 862 (VEC). I have conferred with AUSA Marguerite Colson who informs me that the government has no objection to this request.

Respectfully submitted,

Ezra Spilke

cc: AUSA Marguerite Colson, by ECF